

SECUNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 3:18-CR-97
:
v. : (Mariani, J.)
:
ROSS ROGGIO, : (electronically filed)
Defendant :

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO DEFENDANT'S PRETRIAL MOTION**

AND NOW, the United States of America, by its undersigned counsel, submits the following Motion for Enlargement of Time to File its response to Defendant's Pretrial Motion. In support of this motion the United States alleges as follows:

1. On October 11, 2019, Gino Bartolai, counsel for defendant Ross Roggio, filed a suppression motion (Doc. 65). The United States' response to that motion is due on September 8, 2020.

2. Counsel for the government has been subject to other briefing deadlines constraints due to COVID-19 that prevent preparation and filing of a brief on or before September 8, 2020. Moreover, counsel for the government has been involved in trial preparations for *United States v. Molisa Ramsay*, No. 3:18-cr-245 (RDM). Trial is scheduled to commence on September 15, 2020, and

anticipated to last approximately one week.

3. The undersigned respectfully requests an extension of time to respond to the pretrial motion.

4. It is respectfully submitted that the ends of justice will be served by an extension of time to respond to Roggio's pretrial motion, for a period of 30 days, and excluding from the Speedy Trial clock that associated period of delay. The reasons for this adjournment outweigh the interest of the public and the defendant in a speedy trial.

5. Counsel for the defendant concurs in this motion.

WHEREFORE, for the foregoing reasons, the Government respectfully requests that the Court grant the Motion for Enlargement of Time to File its response to the Defendant's Pretrial Motion and to exclude the associated period of delay from the speedy trial calculation.

Respectfully submitted,

/s/ Todd K. Hinkley

TODD K. HINKLEY

Dated: September 8, 2020

Assistant United States Attorney
235 N. Washington Ave., Suite 311
Scranton, PA 18503
(570) 348-2800 (telephone)

CERTIFICATE OF CONCURRENCE/NONCONCURRENCE

I, Todd K. Hinkley, Assistant United States Attorney, have contacted Gino Bartolai, Esquire, counsel for defendant Ross Roggio, who concurs in the filing of this motion.

/s/ Todd K. Hinkley

TODD K. HINKLEY
Assistant United States Attorney
235 N. Washington Ave., Suite 311
Scranton, PA 18503
(570) 348-2800 (telephone)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 8th day of September, 2020, I caused the foregoing Motion to be filed and that attorney Gino Bartolai, Esquire, is a filing user under the ECF system. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic Filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic Filing constitutes service of the filed document and no additional service upon the filing user is required.

/s/ Katherine Sanchez
KATHERINE SANCHEZ
Legal Assistant